

IN THE UNITED STATES DISTRICT COURT FOR BALTIMORE MARYLAND  
101 W Lombard Street, Baltimore Maryland 21201

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JUN 17 2022

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY

DEPUTY

MOORE, Thom dba  
OSI  
c/o 354 S. Locust Street #1  
Hagerstown, MD 21740  
Plaintiff

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v.

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Antietam Broadband  
1000 Willow Circle  
Hagerstown, MD 21740  
Defendant

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Washington Co. MD Government  
1000 West Washington Street  
Hagerstown, MD 21740  
Co-defendant

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CASE NO.

22-cv-1484-ADC

**PETITION for EMERGENCY INJUNCTIVE RELIEF**  
**BACKGROUND AND HISTORY**

Antietam Broadband (hereby referred to ACTV) is a small, regional cable, phone and television provider for northwest Maryland and parts of southwest Pennsylvania and northeastern West Virginia with approximately 133,000 residential and business customers. It is a subsidiary of Kokomo, IN. based Schurz Communications, an approximately \$450,000,000 communications conglomerate which engages in interstate communication and commerce in various semi-rural parts of the country. Antietam has arranged through sweet heart deals with Washington Co. MD Govt et. al. to be a monopoly provider of internet and other services to Washington County. Of all the companies in this region, most of them small enterprises, Antietam Broadband is the most reviled company in the region for its terrible customer service,

high rates, and bullying tactics with customers while frequently cancelling service for those who make legitimate complaints.

Thom Moore OSI is a small proprietorship consultancy with a key office location in Hagerstown, MD where the business's business manager and business operations are centered. Specifically, all key e files are located there which are wholly dependent upon INTERNET CONNECTION.

On or about JUNE 2, 2022, Antietam disconnected service sans notice based on a legitimate complaint made via email to Antietam's Director of Customer Service, Roy Rudd and a Manager of Engineering Greg based on their persistent failure to provide a modicum of customer service. The most recent event was that just after TV service was provided, the TV remote was found to not work (old, used remote device where buttons were not responsive).

Antietam also recorded calls without customer knowledge and consent. Antietam has also threatened the Plaintiff with cut off for "rude and abusive behavior" which is patently false. Plaintiff hereby DEMANDS THAT Antietam now save and preserve all calls between the two parties for litigation. It should also be noted that the plaintiff is NOT in arrears on its account. ACTV's actions are purely retaliatory because of our complaint about their failed service.

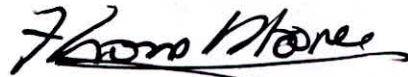
The internet service was set up in the residence of the business manager who relied on it for his own personal affairs as well as business matters for OSI. He has now been cut off from his medical doctors (at a crucial time when he needs contact with his doctors after being hospitalized. Further, OSI missed a deadline for a proposal submission for consulting as well as a proposal for a publication. Neither has the firm been able to engage in routine communication with other business contacts. On top of this, TV service has been cut off for our business manager at a time when he just returned home from hospitalization. He is essentially sitting in an

apartment with no contact with the outside world at a time when he needs to be in contact with medical providers after hospitalization.

This constitutes a violation of FCC and ICC law not to mention state of Maryland Consumer Protection laws. Further, the federal courts are now allowing litigants such as ourselves to communicate with the court electronically in legal matters, which we cannot now do because of ACTV malfeasant conduct.

Plaintiff now begs this court to order the defendant, Antietam Broadband to resume service IMMEDIATELY. In the interim, a legal complaint will be submitted against ACTV and Washington County MD Government.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thom Moore", with a long horizontal line extending from the end of the signature.

Thom Moore DBA OSI  
DATE: June 4, 2022

CERTIFICATE OF SERVICE: A True and correct copy of this petition for emergency relieve has been mailed to Antietam Broadband c/o of US first class mail, pre-paid service on this 4<sup>th</sup> day of June, 2022 c/o 1000 Willow Circle, Hagerstown, MD. 21740